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March 5, 2015

**BY ECF**

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Karen Alameddene,*  
14 Cr. 808 (GHW)

Dear Judge Woods:

This letter is submitted on behalf of Karen Alameddene, defendant in the above-entitled case, and whom I represent by CJA appointment. The next pretrial conference in this case is scheduled for Tuesday, March 10, 2015, at 2:30 p.m. However, for the reasons set forth below, it is respectfully requested that the pretrial conference be adjourned until the week of March 23, 2015. I have spoken with Assistant United States Attorney Stanley J. Okula, Jr., and he has informed me that the government does not object to this request.

The request for an adjournment of the pretrial conference is based on the continuing negotiations between the parties in an effort to reach a resolution in this matter. While progress has been made, additional time is needed to discuss the details of any such agreement (which will determine whether such an agreement can be reached). As a result, it is respectfully submitted that postponing the conference for two weeks would present a more efficient use of the Court's and counsel's resources.

Regarding available dates, both AUSA Okula and I are available for much of the week of March 23, 2015. Tuesday, March 24, 2015 or Thursday, March 26, 2015, are the preferred dates, with the exception of Thursday morning, at which time I have a sentencing scheduled for 10 a.m.

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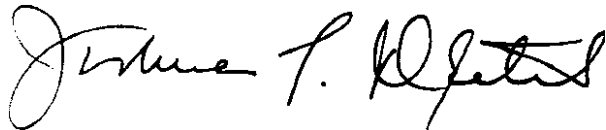
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in this District. I also have a sentencing at 9:45 a.m. Friday, March 27, 2015, in this District, and a teaching commitment the afternoon of Wednesday, March 25, 2015. Otherwise, AUSA Okula and I are available that week.

In addition, I have been informed by AUSA Okula that should the Court grant the request for the adjournment of the pretrial conference, the government requests that for purposes of the Speedy Trial clock, the intervening time between March 10, 2015, and the date to which the conference would be re-scheduled be excluded. In addition to the negotiations described above, the government has also recently provided additional discovery that it has obtained. Both factors warrant exclusion of the time from the Speedy Trial calculation. Ms. Alameddene consents to the exclusion of time.

Accordingly, it is respectfully requested that the Court adjourn the pretrial conference scheduled for March 10, 2015, until a date and time convenient to the Court during the week of March 23, 2015.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joshua L. Dratel", written in a cursive style.

Joshua L. Dratel

JLD/

cc: Stanley J. Okula, Jr.  
Assistant United States Attorney